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20 Troy Capital, LLC and Third-Party Defendants  
21 Rance Willey and Troy Dupuis

13  
14 **UNITED STATES DISTRICT COURT**  
15  
16 **DISTRICT OF NEVADA**

17 TROY CAPITAL LLC, a Nevada Limited  
18 Liability Company,

19 Plaintiff,

20 vs.

21 PATENAUXE & FELIX APC, et al.,

22 Defendants.

23 PATENAUXE & FELIX APC,

24 Counterclaimant/Third-Party  
25 Plaintiff

26 vs.

27 TROY CAPITAL LLC, a Nevada Limited  
28 Liability Company; RANCE WILLEY, an  
Individual, and TROY DUPUIS, an Individual,

Counterdefendants/Third-Party  
Defendants

CASE NO.: 2:20-cv-00205-JCM-DJA

**STIPULATION TO EXTEND TIME TO  
RESPOND TO DEFENDANTS' MOTION  
TO COMPEL PRODUCTION OF  
DOCUMENTS AND WITNESS  
DEPOSITION**

**(First Request)**

Current Deadline: October 31, 2022

New Deadline: November 7, 2022

The Hon. Daniel J. Albrechts

Pursuant to LR IA 6-1, LR IA 6-2, and LR 7-1, the parties, through their respective counsel, stipulate to extend the time for Plaintiff to respond to Defendants' pending Motion to Compel Production of Documents and Witness Deposition (ECF No. 150), which was filed on October 17, 2022. This is the parties' first request. Good cause for this stipulation exists based on the following:

1. On October 17, 2022, Defendants filed a Motion to Compel Production of  
 5 Documents and Witness Deposition. ECF No. 150. The motion seeks to compel Troy Capital to  
 6 Produce various documents and compel nonparty Kelly MacBeth to appear for deposition.

2. Pursuant to the Court's Local Rules, Plaintiff and Ms. MacBeth's deadline to  
 8 oppose the motion is October 31, 2022. L.R. 7-2(b). Defendants' deadline to file their reply is  
 9 November 7, 2022. *Id.*

3. Good cause exists for the brief one-week extension of the deadlines. Lead  
 11 counsel for Plaintiff and Ms. MacBeth, Tomio Narita, has been travelling out-of-state during the  
 12 week of October 24 and has been simultaneously dealing with several pressing deadlines in other  
 13 matters. As a result, counsel has not had sufficient time to dedicate to preparing the opposition  
 14 briefs. In addition, co-counsel for Plaintiff and Ms. MacBeth who is assisting with the  
 15 preparation of the opposition briefs, R. Travis Campbell, tested positive and was recovering from  
 16 COVID-19 during the week of October 17. Accordingly, Plaintiff and Ms. MacBeth have  
 17 requested, and Defendants have agreed, to extend the opposition deadline to the Motion to  
 18 Compel by one week to November 7, 2022.

4. Accordingly, the parties hereby stipulate and jointly request that the Court extend  
 20 the deadline for Plaintiff and Ms. MacBeth to respond to Defendants' Motion to Compel  
 21 Production of Documents and Witness Deposition (ECF No. 127) to November 7, 2022, and  
 22 extend the deadline for Defendants to file their reply to November 14, 2022.

5. This requested extension of time is not sought for delay or any other improper  
 24 purpose. The parties respectfully submit that the reasons set forth above constitute good cause for  
 25 the extension.

28 DATED this 28<sup>th</sup> day of October, 2022  
 SIMMONDS & NARITA LLP

DATED this 28<sup>th</sup> day of October, 2022  
 RELIEF LAWYERS, LLC

1 /s/R. Travis Campbell

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3 (Admitted *pro hac vice*)  
4 R. Travis Campbell  
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9 *TROY CAPITAL, LLC and Third-Party Defendants*  
10 *RANCE WILLEY and TROY DUPUIS*

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8 *Attorneys for Plaintiff/Counterdefendant*  
9 *TROY CAPITAL, LLC and Third-Party Defendants*  
10 *RANCE WILLEY and TROY DUPUIS*

11 DATED this 28<sup>th</sup> day of October, 2022  
12 SANTORO WHITMIRE

11 DATED this 28<sup>th</sup> day of October, 2022  
12 LEWIS BRISBOIS BISGAARD &  
13 SMITH LLP

14 /s/Jason D. Smith

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21 *PATENAUDA, MICHAEL D. KAHN and ANGIE*  
22 *HONG HOAR*

23 DATED this 28<sup>th</sup> day of October, 2022  
24 SIMMONDS & NARITA LLP

25 /s/R. Travis Campbell

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32 *Attorneys for Nonparty*  
33 *KELLY MACBETH*

34 IT IS SO ORDERED:



34 DANIEL J. ALBREGTS  
35 UNITED STATES MAGISTRATE JUDGE

36 DATED: 10/31/2022